

MEMORANDUM

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEMO ENDORSED

LANDMEN PARTNERS INC., Individually
and On Behalf of All Others Similarly
Situating,

Plaintiffs,

v.

THE BLACKSTONE GROUP L.P.,
STEPHEN A. SCHWARZMAN and
MICHAEL A. PUGLISI,

Defendants.

TIMOTHY McADAM, Individually and On
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

THE BLACKSTONE GROUP L.P.,
STEPHEN A. SCHWARZMAN and
MICHAEL A. PUGLISI,

Defendants.

DAVID W. JAKEMAN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiffs,

v.

THE BLACKSTONE GROUP L.P.,
STEPHEN A. SCHWARZMAN and
MICHAEL A. PUGLISI,

Defendants.

Civil Action No. 08 CV 3601 (en)

5/13/2008

The court will not
So order the stipulation.
The court will
conferance the

Civil Action No. 08 CV 3838

Case and set its
own schedule for
all these dates.The schedule will
Civil Action No. 08 CV 04064Not be nearly ~~as~~
generous as you
might incl. Conferenceis set for June 18th, 2008 @ 10:30 a.m.

Clerk of Court

5/13/08	DATE FILED
	DOC #
	ELECTRONICALLY FILED
	DOCUMENT
	USDS SDNY

DAVID B. GALCHUTT, Individually and On	:	Civil Action No. 08 CV 4110
Behalf of All Others Similarly Situated,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	STIPULATION AND
	:	[PROPOSED] ORDER EXTENDING
THE BLACKSTONE GROUP L.P.,	:	<u>TIME TO RESPOND TO COMPLAINTS</u>
STEPHEN A. SCHWARZMAN and	:	
MICHAEL A. PUGLISI,	:	
	:	
Defendants.	:	

-----X

It is hereby STIPULATED AND AGREED by and between the undersigned counsel for the parties as follows:

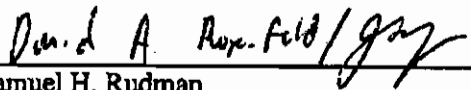
1. The time for all Defendants to respond or move against the complaints in the above-captioned actions is extended until after the Court appoints lead plaintiff and plaintiffs counsel and a Consolidated Amended Complaint is filed.
2. Forty-five (45) days after entry of the order appointing lead plaintiff, lead plaintiff will file a Consolidated Amended Complaint.
3. Forty-five (45) days after the Consolidated Amended Complaint is filed, Defendants will either answer the Consolidated Amended Complaint or move to dismiss the Consolidated Amended Complaint.
4. If any or all of Defendants move to dismiss the Consolidated Amended Complaint, lead plaintiff will file within forty-five (45) days papers opposing such motion(s). Defendants will then have thirty (30) days to reply to such opposition(s).
5. Nothing in this stipulation constitutes a waiver of any rights, remedies or defenses, including, without limitation, lack of personal jurisdiction, with the sole

exception that Defendants agree to waive the defense of insufficient process. Assuming service (which will not be contested) was valid, the original dates for Defendants to reply were as follows: Landmen Partners, Inc., May 13, 2008. A request for waiver of service of process has been received in connection with the David W. Jakeman complaint. The complaints of Timothy McAdam and David B. Galchutt have not yet been served. The parties have submitted no prior requests for extension and request this extension in order to allow the appointment of lead plaintiff and the filing of a consolidated complaint.

Dated: New York, New York
May 12, 2008

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

BY:



Samuel H. Rudman

srudman@csgrr.com

David A. Rosenfeld

drosenfeld@csgrr.com

58 South Service Road, Suite 200

Melville, NY 11747

Telephone: (631) 367-7100

Facsimile: (631) 367-1173

ABRAHAM FRUCHTER AND
TWERSKY LLP

Jack Fruchter

One Penn Plaza, 47th Fl.

New York, NY 10119

Telephone: (212) 279-5050

Attorneys for Landmen Partners, Inc.

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

BY:

David A. Rosenfeld / g 22
Samuel H. Rudman

srudman@csgrr.com

David A. Rosenfeld

drosenfeld@csgrr.com

58 South Service Road, Suite 200

Melville, NY 11747

Telephone: (631) 367-7100

Facsimile: (631) 367-1173

HOLZER HOLZER & FISTEL, LLC

Michael I. Fistel Jr.

1117 Perimeter Center West, Suite E-107

Atlanta, GA 30338

Telephone: (770) 392-0090

Facsimile: (770) 392-0029

DYER & BERENS LLP

Robert J. Dyer III

Jeffrey A. Berens

682 Grant Street

Denver, CO 80203

Telephone: (303) 861-1764

Facsimile: (303) 395-0393

Attorneys for Timothy McAdam

STULL, STULL & BRODY

BY: Aaron Brody / gny
Jules Brody
ssbny@aol.com
Aaron Brody
ssbny@aol.com
6 East 45th Street
New York, NY 10017
Telephone: (212) 687-7230
Facsimile: (212) 490-2022

WEISS & LURIE

Joseph H. Weiss
551 Fifth Avenue
New York, NY 10176
Telephone: (212) 682-3025
Facsimile: (212) 682-3010

Attorneys for David W. Jakeman

SHALOV STONE BONNER & ROCCO LLP

BY: Ralph M. Stone / gny
Ralph M. Stone
rstone@lawssb.com
Thomas G. Ciarlone
tciarlone@lawssb.com
485 Seventh Avenue, Suite 1000
New York, NY 10018
Telephone: (212) 239-4340
Facsimile: (212) 239-4310

SPECTOR ROSEMAN & KODROFF,
P.C.

Robert M. Roseman
rroseman@srk-law.com
David Felderman
dfelderman@srk-law.com
1818 Market Street
Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300
Facsimile: (215) 496-6611

Attorneys for David B. Galchutt

SIMPSON THACHER & BARTLETT LLP

BY: 

Bruce D. Angiolillo (BA-9271)

bangiolillo@stblaw.com

Jonathan K. Youngwood (JY-2234)

jyoungwood@stblaw.com

Paul J. Sirkis (PS-7516)

psirkis@stblaw.com

425 Lexington Avenue

New York, New York 10017-3954

Telephone: (212) 455-2000

Facsimile: (212) 455-2502

*Attorneys for The Blackstone Group, L.P.,
Stephen A. Schwarzman and Michael A.
Puglisi*

IT IS SO ORDERED:

DATED: _____


THE HONORABLE COLLEEN MCMAHON
UNITED STATES DISTRICT JUDGE